

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

- a. One (1) fashion ring in 14k yellow gold;
- b. One (1) Eternity ring with 138 brilliant diamonds;
- c. One (1) Rolex Yacht-Master model number 1662;
- d. One (1) 14k yellow gold bangle with 213 diamonds;
- e. One (1) curb link chain with 747 brilliant diamonds and 14k yellow gold;
- f. One (1) Rolex Day Date II Superlative Chronometer;
- g. One (1) Eternity ring with 158 brilliant diamonds;
- h. One (1) curb link chain with 1,645 brilliant diamonds;
- i. One (1) saw film series pendants in 14k yellow gold;

Defendants *In Rem*.

Civil No.:

VERIFIED COMPLAINT FOR FORFEITURE IN REM

TO THE HONORABLE COURT:

COMES NOW, the United States of America brings this Verified Complaint for Forfeiture *In Rem* pursuant to Supplemental Rule G(2) of the Federal Rules of Civil Procedure, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, and alleges as follows:

Nature of the Action

1. This is a civil action *In Rem* pursuant to:
 - a. 18 U.S.C. § 981(a)(1)(A) “Any property, real or personal, involved in a transaction or attempted transaction in violation of section 1956, 1957 or 1960 of this title, or any property traceable to such property.”
 - b. 21 U.S.C. 881(a)(6) “All moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of this subchapter, all proceeds traceable to such an exchange, and all moneys, negotiable instruments, and securities used or intended to be used to facilitate any violation of this subchapter.”

Jurisdiction and Venue

2. This Court has subject matter jurisdiction over an action commenced by the United States pursuant to 28 U.S.C. § 1345; over an action for forfeiture pursuant to 28 U.S.C. § 1355; and over this particular action pursuant to 18 U.S.C. § 981(a)(1)(A) and 21 U.S.C. 881(a)(6).

3. Venue is proper in this district and the Court has *In Rem* jurisdiction over the defendant currency pursuant to 28 U.S.C. §§ 1355(b)(1)(A) and 1395(b) because the acts and omissions giving rise to the forfeiture occurred in this district.

The Defendants In Rem

4. The Defendants *In Rem* are:
 - one (1) fashion ring in 14k yellow gold

- one (1) Eternity ring with 138 brilliant diamonds
- one (1) Rolex Yacht-Master model number 16623
- one (1) 14k yellow gold bangle with 213 diamonds
- one (1) curb link chain with 747 brilliant diamonds and 14k yellow gold
- one (1) Rolex Day Date II Superlative Chronometer
- one (1) Eternity ring with 158 brilliant diamonds
- one (1) curb link chain with 1,645 brilliant diamonds
- one (1) saw film series pendants in 14k yellow gold

Facts

5. The Defendants *In Rem* were seized on January 27, 2022, from a wine in color Toyota Highlander license plate JAL 723, driven by Keyshla Michelle Rodriguez-Acevedo. This Verified Complaint fully incorporates the facts contained in the attached Unsworn Declaration of Special Agent Jose Rosario of the Federal Bureau of Investigation.

Claim for Relief

6. The United States of America respectfully requests that the Court issue a warrant of arrest for the Defendants *In Rem*; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that the Court enter judgment declaring the Defendants *In Rem* condemned and forfeited to the United States of America for disposition according to law; and that the Court grant the United

States of America such other and further relief as the Court may deem just and proper, together with the costs and disbursements of this action.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 16th day of February 2024.

W. Stephen Muldrow
United States Attorney

/s/Myriam Y. Fernández-González
Myriam Y. Fernández-González
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VERIFIED DECLARATION

I, Myriam Y. Fernandez-Gonzalez, Assistant United States Attorney, declare pursuant penalty of perjury as provided by 28 U.S.C. § 1746, the following:

That the foregoing Complaint is based on reports and information furnished to me by the Drug Enforcement Agency (DEA); that everything contained therein is true and correct to the best of my knowledge and belief.

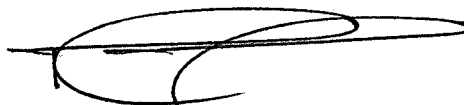
Executed in San Juan, Puerto Rico, this 16th day of February 2024.

/s/Myriam Y. Fernández-González
Myriam Y. Fernández-González
Assistant United States Attorney

VERIFICATION

I, Jose Rosario, depose and say that I am a Special Agent with the Federal Bureau of Investigation and as such have responsibility for the within action, that I have read the contents of the foregoing Verified Complaint for Forfeiture *In Rem* and, pursuant to 28 U.S.C. § 1746, verify pursuant to penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed in San Juan, Puerto Rico, this 16th day of February 2024.

A handwritten signature in black ink, appearing to be 'Jose Rosario', written over a horizontal line.

Jose Rosario, Special Agent
Federal Bureau of Investigation (FBI)